

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Brenda Kelly ,)	CASE NO. 1:17-cv-02159
)	
)	
Plaintiff(s),)	JUDGE CHRISTOPHER A. BOYKO
)	
vs.)	
)	
Ohio Department of Developmental)	
Disabilities,)	
Defendant(s).)	<u>REPORT OF PARTIES' PLANNING</u>
)	<u>MEETING UNDER FED. R. CIV.</u>
)	<u>P. 26(f) AND L.R. 16.3(b)</u>

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 16.3(b), a meeting was held on
December 28, 2017, and was attended by:

David J. Steiner counsel for plaintiff(s) Brenda Kelly

counsel for plaintiff(s)

Erin Butcher counsel for defendant(s) Department of Developmental
Disabilities

counsel for defendant(s)

2. The parties:

have exchanged the pre-discovery disclosures required by Rule 26(a)(1) and
the Court's prior order;

X will exchange such disclosures by January 12, 2018 ;

have not been required to make initial disclosures.

3. The parties recommend the following track:

☐ Expedited ☒ Standard ☐ Complex ☐ Administrative ☐ Mass Tort

4. Pursuant to Local Rule 5.1(c) all documents must be electronically filed absent a showing of good cause

5. This case **is** suitable for one or more of the following Alternative Dispute Resolution (ADR) mechanisms:

☒ Early Neutral Evaluation ☒ Mediation ☐ Arbitration.

☐ Case **is not** suitable for ADR at this time but may be after discovery.

☐ Case **is not** suitable for ADR at any time.

6. The parties ☐ do/ ☒ do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

7. Recommended Discovery Plan:

(a) Describe the subjects, nature and extent of discovery

The parties intend to engage in discovery on all issues raised in the complaint and the answer, including but not limited to personnel files, audio recordings, and depositions.

_____ :

(b) Non-Expert discovery cut-off date: October 1, 2018

(c) Plaintiff's expert report due date: August 1, 2018

(d) Defendant's expert report due date: August 31, 2018

(e) Expert discovery cut-off date: October 1, 2018

8. Recommended cut-off date for amending the pleadings and/or adding additional parties: February 2, 2018

9. Recommended dispositive motion date: October 31, 2018

10. Recommended date for a Status Hearing/Settlement Conference:
July 30, 2018

11. Other matters for the attention of the Court: _____

_____.

/s/ David J. Steiner

Attorney for Plaintiff(s) Brenda Kelly

Attorney for Plaintiff(s) _____

/s/ Erin E. Butcher

Attorney for Defendant(s) Department of Developmental
Disabilities

Attorney for Defendant(s) _____